

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

ACS STATE HEALTHCARE, LLC,  
a Delaware Limited Liability Company,

Plaintiff,

vs.

FOURTHOUGHT GROUP, INC., an Arizona  
Corporation,

Defendant - Intervenor.

Case No. 4:08cv3021

**FOURTHOUGHT GROUP, INC.'S  
AMENDED DISCLOSURE OF NON-  
EXPERT WITNESSES**

Defendant -Intervenor FourThought Group, Inc. (“4TG”), pursuant to the Court's Second Amended Final Progression Order and F.R.C.P. 26(a)(3), identifies the following non-expert witnesses it will/may call to testify at trial in this matter, except those who may be called for impeachment purposes only:

- |                        |           |
|------------------------|-----------|
| 1. Patrick Aguilar     | May Call  |
| 2. Dorothy Ball        | May Call  |
| 3. Renee' Bostick      | May Call  |
| 4. Barbera Bridgewater | Will Call |
| 5. Kerris Bridgewater  | May Call  |
| 6. Walter Bridgewater  | May Call  |
| 7. Kelley Carson       | Will Call |
| 8. Carlos Castillo     | May Call  |
| 9. Gary Chernich       | May Call  |

- |   |          |
|---|----------|
| 10. Benni DeMarco   | May Call |
| 11. Gino DeMarco  | May Call |
| 12. Rod Kranzler  | May Call |
| 13. Aman Khurana  | May Call |
| 14. Rodger Leonard  | May Call |
| 15. Faye Makishima  | May Call |
| 16. Shaun Meeks   | May Call |
| 17. Wade Miller   | May Call |
| 18. Paul Quattro  | May Call |
| 19. Representative<br>First Data Government Solutions, Inc.   | May Call |
| 20. Representative<br>Nebraska Department of<br>Administrative Services   | May Call |
| 21. Representative<br>Nebraska Department of<br>Health and Human Services   | May Call |
| 22. Michael Robinson  | May Call |
| 23. Ernie Saxman  | May Call |
| 24. Any witness identified by Plaintiff<br>ACS State Healthcare, LLC and, if the State<br>Defendants <sup>1</sup> are rejoined in this matter,<br>any witness identified by the State Defendants. | May Call |
| 25. Scott Miner   | May Call |

---

<sup>1</sup> “State Defendants” is the collective term for: David Heineman in his official capacity as Governor of the State of Nebraska, Jon Bruning in his official capacity as Attorney General of the State of Nebraska, Carlos Castillo in his official capacity as Director of the Nebraska Department of Administrative Services, Christine Peterson, who is the former CEO of the Nebraska Department of Health & Human Services, and Steve Sulek in his official capacity as Acting Material Division Administrator.

26. Steve Curtis

May Call

27. Jim Bridges

May Call

4TG reserves the right to amend or supplement this disclosure to add individuals identified through additional discovery and depositions in this matter, if necessary. 4TG reserves the right to call witnesses at trial for impeachment purposes, if necessary. 4TG reserves the right to call witnesses at trial for purposes of establishing foundation to admit documents or to respond to evidentiary objections, if necessary.

DATED this 15th day of May, 2009.

FOURTHOUGHT GROUP, INC.  
Defendant-Intervenor

By: /s/ Henry L. Wiedrich  
Thomas H. Dahlk (#15371)  
L. Steven Grasz (#19050)  
Henry L. Wiedrich (#23696)  
HUSCH BLACKWELL SANDERS, LLP  
1620 Dodge Street, Suite 2100  
Omaha, NE 68102  
Telephone: (402) 964-5000  
Facsimile: (402) 964-5050  
[tom.dahlk@huschblackwell.com](mailto:tom.dahlk@huschblackwell.com)  
[steve.grasz@huschblackwell.com](mailto:steve.grasz@huschblackwell.com)  
[henry.wiedrich@huschblackwell.com](mailto:henry.wiedrich@huschblackwell.com)

ATTORNEYS FOR FOURTHOUGHT GROUP,  
INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of March, 2009, that the above was electronically filed with the Clerk of the Court using the CM/ECF system, which sent notice of the same to the following:

Bartholomew L. McLeay	<a href="mailto:bart.mcleay@kutakrock.com">bart.mcleay@kutakrock.com</a>
Thomas J. Kenny	<a href="mailto:thomas.kenny@kutakrock.com">thomas.kenny@kutakrock.com</a>
Suzanne M. Shehan	<a href="mailto:suzanne.shehan@kutakrock.com">suzanne.shehan@kutakrock.com</a>
Amber A. Furbee	<a href="mailto:amber.furbee@kutakrock.com">amber.furbee@kutakrock.com</a>
Kutak Rock LLP	
1650 Farnam Street	
Omaha, NE 68102-2186	

/s/ Henry L. Wiedrich \_\_\_\_\_